

Sander L. Esserman
State Bar No. 006671500
Steven A. Felsenthal
State Bar No. 06889900
Heather J. Panko
State Bar No. 24049516
**STUTZMAN, BROMBERG,
ESSERMAN & PLIFKA**
A Professional Corporation
2323 Bryan Street, Suite 2200
Dallas, Texas 75201-2689
Telephone: (214) 969-4900
Facsimile: (214) 969-4999

Brad S. Karp
Stephen J. Shimshak
Jordan E. Yarett
Susanna M. Buergel
**PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP**
1285 Avenue of the Americas
New York, New York 10019-6064
Telephone: (212) 373-3000
Facsimile: (212) 757-3990

Attorneys for the Office of the Commissioner of Baseball

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

-----X	:	
In re	:	Chapter 11
	:	
TEXAS RANGERS BASEBALL PARTNERS,	:	Case No. 10-43400 (DML)
	:	
Debtor.	:	
	:	
-----X	:	

**STATEMENT OF THE OFFICE OF
THE COMMISSIONER OF BASEBALL IN SUPPORT OF THE LEGAL
POSITIONS OF THE DEBTOR AND RANGERS BASEBALL EXPRESS LLC**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The Office of the Commissioner of Baseball (“BOC”), a creditor and party in interest in this chapter 11 case, by its undersigned attorneys states as follows concerning the issues identified by this Court for hearing on June 15, 2010 (the “June 15 Issues”) as set forth in the Order (I) Scheduling a Hearing to Consider Issues Relating to the Disclosure Statement and Issues Relating to Plan Confirmation; (II) Establishing Deadlines with Respect Thereto; (III) Approving the Form and Manner of Notice of the Deadlines and the Hearing; and (IV) Granting Related Relief, dated June 2, 2010 [Docket No. 119] (the “Order”):

1. The BOC supports the legal positions of Texas Rangers Baseball Partners (the “Debtor”) and Rangers Baseball Express LLC (the “Purchaser”) on the June 15 Issues.

2. The BOC reserves the right to supplement those positions at the hearing on the June 15 Issues to respond to the position of any other party in interest (including by written submission), concerning, without limitation, any matter that the BOC determines implicates the interests of Major League Baseball.

NOTICE

3. No trustee or examiner has been appointed in this chapter 11 case. Notice of this statement has been provided in accordance with the Order to: (i) counsel to the Debtor, Weil, Gotshal & Manges LLP, 200 Crescent Court, Suite 300, Dallas, Texas 75201, Attn: Martin A. Sosland, Esq. (martin.sosland@weil.com) and Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: Ronit J. Berkovich, Esq. (ronit.berkovich@weil.com); (ii) counsel to the Purchaser, Foley & Lardner LLP, 777 East Wisconsin Avenue, Milwaukee, Wisconsin 53202, Attn: Mary K. Braza, Esq. (mbraza@foley.com) and Kevin R. Schulz, Esq. (kschulz@foley.com) and Foley & Lardner LLP, 321 North Clark Street, Suite 2800, Chicago, Illinois 60610, Attn: Michael J. Small, Esq.

(msmall@foley.com); (iii) counsel to the Purchaser, Sherrard, German & Kelly, P.C., 28th Floor, Two PNC Plaza, 620 Liberty Avenue, Pittsburgh, Pennsylvania 15222, Attn: David J. Lowe, Esq. (djl@sgkpc.com); (iv) counsel to the Purchaser, Barlow Garsek & Simon, LLP, 3815 Lisbon Street, Fort Worth, Texas 76107, Attn: Robert A. Simon, Esq. (rsimon@bgsfirm.com); (v) counsel to the Committee of Unsecured Creditors; (vi) the U.S. Trustee, 1100 Commerce Street, Room 976, Dallas, Texas 75242, Attn: Lisa L. Lambert, Esq. (lisa.l.lambert@usdoj.gov) and Meredyth A. Kippes, Esq. (meredyth.a.kippes@usdoj.gov); (vii) counsel to JPMorgan Chase Bank, N.A., Latham & Watkins LLP, 885 Third Avenue, New York, New York 10022, Attn: Mitchell Seider, Esq. (mitchell.seider@lw.com) and Joseph Fabiani, Esq. (joseph.fabiani@lw.com); (viii) counsel to GSP Finance LLC, Clifford Chance US LLP, 31 West 52nd Street, New York, New York 10019, Attn: Jason P. Young, Esq. (Jason.Young@cliffordchance.com); (ix) counsel to the Ad Hoc Group of First Lien Lenders, Vinson & Elkins LLC, Trammell Crow Center, 2001 Ross Avenue, Suite 3700, Dallas, Texas 75201, Attn: Daniel C. Stewart, Esq. (dstewart@velaw.com); (x) counsel to the Ad Hoc Group of First Lien Lenders, Milbank, Tweed, Hadley & McCloy LLP, Suite 1100, International Square Building, 1850 K Street, N.W., Washington, DC 20006, Attn: Andrew M. LeBlanc, Esq. (aleblanc@milbank.com); (xi) counsel to JPMorgan Chase Bank, N.A., Rochelle McCullough, LLP, 325 N. St. Paul Street, Suite 4500, Dallas, Texas 75201, Attn: Buzz Rochelle, Esq. (buzz.rochelle@romclawyers.com) and Scott DeWolf, Esq. (sdewolf@romclawyers.com); and (xii) counsel to GSP Finance LLC, Agent for the Second Lien Lenders, Gardere Wynne Sewell LLP, 1601 Elm Street, Suite 3000, Dallas, Texas 75501, Attn: Holland N. O'Neil, Esq. (honeil@gardere.com).

Dated: June 11, 2010
Fort Worth, Texas

**STUTZMAN, BROMBERG,
ESSERMAN & PLIFKA
A PROFESSIONAL CORPORATION**

By: /s/ Sander L. Esserman
Sander L. Esserman
State Bar No. 006671500
Steven A. Felsenthal
State Bar No. 06889900
Heather J. Panko
State Bar No. 24049516

2323 Bryan Street, Suite 2200
Dallas, Texas 75201-2689
Telephone: (214) 969-4900
Facsimile: (214) 969-4999

-and-

Brad S. Karp
Stephen J. Shimshak
Jordan E. Yarett
Susanna M. Buergel
**PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP**
1285 Avenue of the Americas
New York, New York 10019-6064
Telephone: (212) 373-3000
Facsimile: (212) 757-3990

**ATTORNEYS FOR THE OFFICE OF
THE COMMISSIONER OF
BASEBALL**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of June 2010, she caused a true and correct copy of the foregoing Statement of the Office of The Commissioner of Baseball in Support of the Positions of the Debtor and Rangers Baseball Express LLC to be served via electronic mail on the parties listed below, and via first class mail, postage prepaid on all parties on the Official Limited Service List Effective June 2, 2010.

/s/ Heather J. Panko

Heather J. Panko

Counsel for the Debtor

Weil, Gotshal & Manges LLP
Attn: Martin A. Sosland
200 Crescent Court, Suite 300
Dallas, Texas 75201
martin.sosland@weil.com

Weil, Gotshal & Manges LLP
Attn: Ronit J. Berkovich
767 Fifth Ave.
New York, New York 10153
ronit.berkovich@weil.com

Counsel to the Purchaser

Sherrard, German & Kelly, P.C.
Attn: David J. Lowe
28th Floor, Two PNC Plaza
620 Liberty Avenue
Pittsburgh, Pennsylvania 15222
djl@sgkpc.com

Counsel to the Purchaser

Foley & Lardner LLP
Attn: Mary K. Braza
Kevin R. Schulz
777 East Wisconsin Avenue
Milwaukee, Wisconsin 53202
mbraza@foley.com
kschulz@foley.com

Foley & Lardner LLP
Attn: Michael J. Small
321 North Clark Street, Suite 2800
Chicago, Illinois 60610
msmall@foley.com

Counsel to the Purchaser

Barlow Garsek & Simon LLP
Robert A. Simon
3815 Lisbon Street
Fort Worth, Texas 76107
rsimon@bgsfirm.com

Counsel to the Committee

K&L Gates LLP
Jeffrey R. Fine
James H. Billingsley
Daniel I. Morenoff
1717 Main Street, Suite 2800
Dallas, Texas 75201
Jeff.fine@klgates.com
James.billingsley@klgates.com
dan.morenoff@klgates.com

Counsel to JPMorgan Chase Bank, N.A.

Latham & Watkins LLP
Attn: Mitchell Seider
Joseph Fabiani
885 Third Avenue
New York, New York 10022
mitchell.seider@lw.com
joseph.fabiani@lw.com

Counsel to the Ad Hoc Group of First Lien Lenders

Vinson & Elkins LLC
Attn: Daniel Stewart
Trammel Crow Center
2001 Ross Avenue
Suite 3700
Dallas, Texas 75201
dstewart@velaw.com

Milbank, Tweed, Hadley & McCloy LLP
Attn: Andrew M. LeBlanc
Suite 1100, International Square Building
1850 K Street, N.W.
Washington, D.C. 20006
aleblanc@milbank.com

United States Trustee

Office of the United States Trustee
Lisa L. Lambert
Meredyth A. Kippes
1100 Commerce Street, Room 976
Dallas, Texas 75242
lisa.l.lambert@usdoj.gov
meredyth.a.kippes@usdoj.gov

Counsel to GSP Finance LLC

Cliffard Chance US LLP
Attn: Jason P. Young
31 West 52nd Street
New York, New York 10019
Jason.young@cliffordchance.com

Counsel to JPMorgan Chase Bank, N.A.

Rochelle McCullough, LLP
Attn: Buzz Rochelle
Scott DeWolf
325 N. St. Paul Street, Suite 4500
Dallas, Texas 75201
buzz.rochelle@romclawyers.com
sdewolf@romclawyers.com

**Counsel to GSP Finance LLC, Agent for the
Second Lien Lenders**

Gardere Wynne Sewell LLP
Attn: Holland O'Neil
1601 Elm Street, Suite 3000
Dallas, Texas 75501
honeil@gardere.com

MLB Players Association

Baker Botts L.L.P
Attn: Jack Kinzie
C. Luckey McDowell
Ian E. Roberts
2001 Ross Avenue
Dallas, Texas 75201
jack.kinzie@bakerbotts.com
luckey.mcdowell@bakerbotts.com
ian.roberts@bakerbotts.com

Cohen, Weiss and Simon LLP
Attn: Richard M. Seltzer
Babette A. Ceccotti
Bruce S. Levine
Joshua J. Ellison
330 West 42nd Street, 25th Floor
New York, New York 10036
rseltzer@cwsny.com
bceccotti@cwsny.com
jellison@cwsny.com